

## 02M-259T

## 2003 Annual Audit Commission Decisions

<b>Issue / Page</b>	<b>Finding / Recommendation</b>	<b>Commission Decision</b>
IV-R1 P9 P56 <b>MR</b>	Continue internal audits of the accuracy of trouble tickets and expand its review to other departments that input critical information into MTAS	Qwest is complying with the auditor's recommendation. Auditor should verify this compliance and validate the findings of Qwest's internal audit for 2004.
IV-R2 P9 P63 <b>MR - 3</b>	Perform detailed analysis of the use of D_EXCEPT 99 and 100 for trouble tickets.	Qwest is complying with the auditor's recommendation. Auditor should verify this compliance and validate the findings of Qwest's internal analysis in the audit for 2004.
IV-R3 P9 P64 <b>MR - 3</b>	Update the PID to relate MTAS and WFAC common exclusions to the appropriate PID exclusions.	We agree with Qwest that this further update to the PID is not necessary unless problems occur in the future that can be related to a disjoint between the PID and the technical documentation.
IV-R4 P9 P64 <b>MR - 3</b>	Update documentation in RRS Chapter 23 for Measures MR-3A, B and C to make it clear that certain records in WFAC may need to be included in these results as opposed to MR-3D and E.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R5 P9 P65 <b>MR - 3</b>	Qwest should validate the product codes for Line Sharing and Line Splitting on future trouble reports.	Qwest is complying with the auditor's recommendation. Auditor should verify this compliance and validate the findings of Qwest's assessment in the audit for 2004.
IV-R6 P9 P99 <b>MR-7</b>	Update the PID to reflect the availability of UNE-Platform Centrex 21 for MR-7 reporting	No further action is necessary on R6 for either the auditor or Qwest.
IV-R7 P9 P99 <b>MR-7</b>	Conduct a sample reconciliation of tickets closed due to customer action in next year's audit	We disagree with Qwest. This validation/reconciliation goes directly to the accuracy of Qwest's data reporting. There is no other way for the auditor to verify the accuracy of Qwest's closing of tickets due to customer action except for the auditor to compare the Qwest data with the CLECs' data.
IV-R8 P9 P103 <b>MR-7</b>	Conduct a reconciliation of the coding of trouble tickets as Out Of Service (OOS) or "service affecting".	We disagree with Qwest that this recommendation is outside the scope of the audit, but the reconciliation doesn't appear to be necessary because only one error was found in reporting out of service verses service affecting tickets.

Exhibit 1

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IV-R9 P9 P109 <b>MR-8</b>	Examine the parity of trouble rates on DS-1 loops for CLECs for root cause analysis and publish in an addendum to this report.	We will wait for the supplemental audit on MR-8 before ordering Qwest to perform any more work.
IV-R10 P9 P122 <b>PO-2</b> <b>PO-5</b>	Investigate the number of CRM records excluded due to duplicate LSR should be investigated as part of the 2005 audit.	19.5% of records excluded are for duplicate LSRs. The auditor should investigate these exclusions as part of 2004 audit.
IV-R11 P9 P122 <b>PO-2</b> <b>PO-5</b>	Investigate the LSR's that are excluded from the CRM metrics due to an invalid CLEC identification as part of the 2004 audit.	Only .02% of records excluded are for invalid CLEC ID. We agree with Qwest that an investigation into these exclusions is not a wise use of resources.
IV-R12 P9 P128 <b>PO-2</b>	Include the PO-2 measures in the 2004 Independent Auditor's work.	We disagree with Qwest. PO-2 misses continue to cause huge penalties each quarter. The 2004 reports and payments should be audited to validate the process for excluding non-flow through eligible LSRs. In this first audit, the IA was only able to assess the affect of a systems change made in 10/03 for two months.
IV-R13 P9 P133 <b>PO-5</b>	Revise Qwest's supporting documentation concerning the calculation of PO-5 in order to provide a clear description of how certain fields are derived and the process to follow to independently replicate performance results.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R14 P9 P140 <b>PO-5</b>	Investigate the reasons for the difference in the calculations of PO-5B-1, PO-5B-2 and PO-5C and validate all derived fields used in the calculation of results as part of the 2004 audit.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.

Exhibit 1

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IV-R15 P10 P153 <b>OP</b>	Develop a process to identify records where the provider is unknown, determine the provider of the service, and correct the inventory records.	We agree with Qwest. The current validation process seems in general to be working. The auditor reports that "the impact [of these errors] to the provisioning metrics is insignificant". The auditor states that these errors may affect the M&R measures if the records are not properly classified and there is trouble on the lines. The auditor should evaluate whether this occurred in 2004, but Qwest should not have to implement a new process at this time.
IV-R16 P10 P159 <b>OP</b>	Include wholesale records with an unknown CLEC_ID in the aggregate CLEC results.	Qwest is complying with the auditor's recommendation. Auditor should verify the findings of Qwest's evaluation in the audit for 2004.
IV-R17 P10 P160 <b>OP-3</b>	Update ordering and provisioning documentation to contain a list of all the customer miss codes so that original fields can be easily used to verify the accuracy of the derived field and adequately describe how Unbundled Conditional Loop results are produced.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R18 P10 P160 <b>OP-3</b>	Update the Availability Section of OP-3 contained in PID V.5.0 so that it reflects Qwest's current reporting.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R19 P10 P161 <b>OP-3</b>	Review a sample of service order miss codes to validate the accuracy as part of the 2004 audit.	We disagree with Qwest. This validation/reconciliation goes directly to the accuracy of Qwest's data reporting. There is no other way for the auditor to verify the accuracy of Qwest's service order miss codes except for the auditor to compare the Qwest data with the CLECs' data.
IV-R20 P10 P175 <b>OP-3</b>	Analyze the OP-3 results to determine the reason for the differences between Qwest's published results and the adhoc results provided N/V in response to DR135.	Qwest is complying with the auditor's recommendation. Auditor should verify Qwest's response in DR 135 by comparing the final adhoc and the final published results in the audit for 2004.

Exhibit 1

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IV-R21 P10 P181 <b>OP-4</b>	Update the Availability Section of OP-4 contained in PID v. 5.0.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R22 P10 P182 <b>OP-4</b>	Update Chapter 15 of Qwest's technical documentation, to reflect the proper information on the calculation of the OP-4 sub-metrics.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R23 P10 P185 <b>OP-4</b>	Validate the codes that identify the responsible party for delays in provisioning of wholesale service as part of the 2004 audit.	We disagree with Qwest. This validation/reconciliation goes directly to the accuracy of Qwest's data reporting. There is no other way for the auditor to verify the accuracy of Qwest's identification of parties responsible for delays in provisioning except for the auditor to compare the Qwest data with the CLECs' data.
IV-R24 P10 P186 <b>OP-4</b>	Revise the technical documentation to clearly state the two fields in the adhoc data used to implement the OP-4 PID exclusion of "customer requested due date longer than the standard offered interval".	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R25 P10 P187 <b>OP-4</b>	Revise the technical documentation of the PID to clearly state how records are categorized into the proper geographical sub-metric for <b>OP-3 [sic]</b> reporting. For example, even though a product is reported as in a high density or low density area, the documentation should be specific that some records for the product may be designated as within or outside the MSA but should still be included as if designated in a high density area if within MSA.	(Should be OP-4 not OP-3 as stated by the Auditor.) Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R26 P10 P202 <b>OP-4</b>	Analyze the OP-4 results to determine the reason for the differences between Qwest's published results and results provided in response to DR135.	Qwest is complying with the auditor's recommendation. Auditor should verify Qwest's response in DR 135 by comparing the final adhoc and the final published results in the audit for 2004.

Exhibit 1

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IV-R27 P10 P203 <b>OP-4</b>	Validate Qwest's 2004 implementation of the exclusion of orders with customer requested due dates longer than the standard offered interval for LIS trunks, E911 and products involving dispatches reported under "MSA-Type Disaggregation" as part of the 2004 audit.	For 2004 audit, auditor should evaluate Qwest's validation from implementation of the products listed.
IV-R28 P11 P212 <b>OP-6</b>	Update the ordering and provisioning technical documentation to show the data fields required to calculate the OP-6 sub-metrics and provide a clear explanation of where the source data is obtained.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R29 P11 P212 <b>OP-6</b>	Update the Availability Section of OP-6 contained in PID V.5.0 to accurately reflect Qwest's current reporting.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R30 P11 P213 <b>OP-6</b>	Review a sample of service order miss codes to validate the accuracy as part of the 2004 audit.	We disagree with Qwest. This validation/reconciliation goes directly to the accuracy of Qwest's data reporting. There is no other way for the auditor to verify the accuracy of Qwest's service order miss codes except for the auditor to compare the Qwest data with the CLECs' data.
IV-R31 P11 P215 <b>OP-6</b>	Revise the technical documentation of the PID to clearly state how records are categorized into the proper disaggregations for OP-6 reporting. The documentation failed to explain that a product code of line split or line share would be accounted for as a unbundled conditional loop if designated as so in another field of the adhoc data.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R32 P11 P215 <b>OP-6</b>	Correct the documentation describing how the OP-6 adhoc field is derived to reflect the proper date to use as the due date of the order for purposes of calculating delay days	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.

Exhibit 1

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IV-R33 P11 P215 <b>OP-6</b>	Replicate 12 months of performance results for OP-6A and OP-6B with independent programming as part of the 2004 audit.	Qwest agrees with the auditor's recommendation. This recalculation of the results for OP-6A and OP-6B should be part of the 2004 audit.
IV-R34 P11 P228 <b>PO-9</b>	Validate jeopardy ticket information used in the PO-9B calculation, to determine whether a timely jeopardy notice was sent for those orders where the due date is missed as part of the 2004 audit.	We disagree with Qwest. This validation/reconciliation goes directly to the accuracy of Qwest's data reporting. There is no other way for the auditor to verify the accuracy of Qwest's reporting of timely jeopardy notices except to compare Qwest's data with CLECs. This is not outside the scope of the annual audit.
IV-R35 P11 P236 <b>OP-7</b>	Conduct on-site observations to validate Qwest's mechanization of the collection of OP-7 data during the 2004 audit.	We disagree with Qwest. OP-7 will continue to grow in importance to the CLECs (duration of completing coordinated hot cuts). The auditor's recommendation to conduct an on-site observation of the Qwest Coordination Center to validate the accuracy of the information of the metrics is important and should be completed as part of the 2004 audit.
IV-R36 P11 P253 <b>OP-13</b>	Conduct a more thorough audit of the data elements required to calculate OP-13A for other unbundled loops in future audits and conduct a review of the Change Management Process used to document process or proceeding changes that cause previously reported performance results to change in later produced reports.	Qwest is complying with the auditor's recommendation. Auditor should verify Qwest's response in DR 135 by comparing the final adhoc and the final published results in the audit for 2004. We disagree with the auditor that an analysis of the CMP process used to document process or product changes when they affect performance results should be reviewed. There were no findings by the auditor that there is a concern that justifies this analysis.
IV-R37 P11 P315 <b>BI-3</b>	Conduct a more extensive analysis to determine if bunching is occurring in BI-3A for the next audit cycle.	Auditor should review BI-3A to follow up from this audit and most likely because it will continue to be one of the PIDs that cause 80% of the payments. More extensive audit is not necessary at this time. Audited months should be chosen with no conversions to skew the data.

Exhibit 1

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IV-R38 P11 P319 <b>OP-8</b>	Address the adequacy of Qwest's supporting documentation for the calculation of OP-8 in N/V's 2004 audit plan.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R39 P11 P320 <b>OP-8</b>	Review the mechanized process which has been implemented to collect data for OP-8 in the 2004 audit.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R40 P11 P321 <b>OP-8</b>	Provide supporting documentation for N/V to compare to Qwest's actual practice to produce OP-8 results and then review for its compliance with the PID.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R41 P12 P322 <b>OP-8</b>	Validate the number of TRIG records omitted from the calculation of OP-8 due to the common exclusions as part of the 2004 audit.	This is not a documentation recommendation as responded to by Qwest. The auditor should validate the TRIG records for accuracy in 2004.
IV-R42 P12 P322 <b>OP-8</b>	Develop specific audit steps to validate the derived fields used in calculating OP-8 results in N/V's 2004 Work Plan.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R43 P12 P322 <b>OP-8</b>	Develop Work Steps required to validate OP-8 PID exclusions and Qwest's compliance in calculating OP-8 results to include in N/V's 2004 Work Plan.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R44 P12 P323 <b>OP-8</b>	Conduct an independent replication of Qwest's reported results for OP-8 as part of the 2004 audit.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004 and include the recalculation of the OP-8 performance results in the 2004 audit.

Exhibit 1

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IV-R45 P12 P326 <b>OP-17</b>	Modify Chapter 22 of the technical documentation so that it clearly defines the source of the TRIG data, all metrics calculated from that source and that the formula for OP-17 matches that contained in the PID.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R46 P12 P329 <b>OP-17</b>	Validate certain derived fields needed to produce OP-17 results once documentation has been provided explaining the source of the derived fields as part of the 2004 audit.	Qwest is complying with the auditor's recommendation to update the documentation. Auditor should verify this documentation update for 2004, and use it to validate the accuracy of the CUSTNTFY and SEC2LAST fields.
IV-R47 P12 P331 <b>OP-17</b>	Validate the accuracy of the data contained in the CUSTNTFY and SEC2LAST fields, which are necessary to produce OP-17A results. Once validated, independently calculate OP-17A results based on the validated fields as part of the 2004 audit.	(Tied to R46 above) Qwest doesn't give a valid reason as to why this reconciliation should not be performed. We agree with the Auditor.
IV-R48 P12 P334 <b>MR-11</b>	Correct the title of MR-11 contained within PID V.5.0 to adequately reflect the metric.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R49 P12 P338 <b>MR-11</b>	Update the MR-11 supporting documentation to provide clear explanations of how all the derived fields used to calculate metric results are obtained.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R50 P12 P339 <b>MR-11</b>	Investigate the discrepancy identified in the RE_NEW field which calculates the interval between trouble received and trouble cleared time for MR-11, to determine the overall impact to other M&R metrics.	This is not a documentation issue as responded to by Qwest. Qwest should comply with the auditor's request and provide N/V with an explanation of the difference between the adhoc time interval and N/V's calculated time interval.



Exhibit 1

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IV-R51 P12 P339 <b>MR-11</b>	Update the supporting documentation to clarify specifically how the determination is made that a trouble ticket was received within a certain time period from the currently-scheduled due date of the LNP disconnect and to provide details on what fields in the adhoc specify that a ticket is confirmed to be caused by a pre-mature LNP disconnect.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R52 P12 P341 <b>MR-11</b>	Include MR-11 in the 2004 audit plan to validate key derived fields, and utilize Qwest's updated documentation to validate metric results for both MR-11A and MR-11B.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
IV-R53 P12 P350 <b>QX</b>	Revise the QX documentation to include a definition of Level 1, Level 2, Level 3 and Level 4 changes, and to accurately describe the processing of the csv file created from the monthly CLEC Notification Tracking Tool.	Chapter 36 should be updated as suggested by the auditor for clarification and complete understanding of the four levels of notifications.
IV-R54 P13 P360 <b>PO-1</b>	Conduct a review to ensure that IRTM simulations used to produce PO-1 results still represent the CLEC experience.	Should allow the auditor access to the EDI transaction report for CO so the auditor can determine whether this report satisfies its needs to verify the number of types of transactions.
IV-R55 P13 P360 <b>PO-1</b>	Establish rules to determine what will justify a change in the simulation weighting for IRTM as recommended by Liberty Consulting Group.	Qwest changes the weightings in the IRTM every six months based on the IPUR reports. This is sufficient. Qwest does not need to establish rules with a different threshold for change.
V-R1 P13 P380	Confirm that Qwest is now archiving all required tables and work files related to the monthly QPARS payment processing.	Qwest is complying with the auditor's recommendation. Auditor should verify this documentation update for 2004.
V-R2 P13 P428	Solicit the cooperation of a CLEC or CLECs to view the electronic reports as filed for the 2004 audit period.	Relying on lack of complaints from CLECs is sufficient. We agree with Qwest that a CLEC's electronic postings aren't needed for N/V's audit.

Exhibit 1

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V-R3 P13 P433	Improve security of the .csv data file by protecting with a "read only" format.	Qwest is complying with this recommendation. Verify the security in the 2004 audit.